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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11
12 JOHN KRESICH,

13 Plaintiff,

14 vs.

15 METROPOLITAN LIFE INSURANCE
COMPANY, Does 1-50,

16 Defendants.
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Case No.: 15-cv-05801-MEJ

**STIPULATION TO CONTINUE
DISCOVERY CUT-OFF AND
MOTION FILING CUT-OFF BY
TWO MONTHS; ~~[PROPOSED]~~
ORDER**

Complaint Filed: July 13, 2015
Trial Date: None

STIPULATION TO CONTINUE DISCOVERY CUT-OFF AND MOTION FILING CUT-OFF
BY TWO MONTHS

TO THE COURT AND THE COURT CLERK:

Plaintiff John Kresich ("Plaintiff") and Defendant Metropolitan Life Insurance Company ("MetLife") hereby stipulate, through their counsel of record, to request the Court to extend by two months the current discovery cutoff date of November 1, 2016, and the current deadline for filing motions of December 1, 2016. The requested extensions will have no impact on the trial date.

The parties respectfully request that the discovery cut-off be continued through and including December 31, 2016, and request that the motion filing deadline be continued through and including February 1, 2017.

Good cause exist for the extension of the discovery deadline, scheduling conflicts beyond the control of the parties and their counsel have prevented completion of discovery, including the taking of numerous depositions. Good cause exists for the extension of the motion filing deadline, as the fact necessary discovery has not been completed has prevented the parties from fully evaluating the need for, and the preparation of possibly dispositive motions.

DATED: November 8, 2016

RAY BOURHIS ASSOCIATES

By: /s/Eric Whitehead

Ray Bourhis
Eric Whitehead
Attorneys for Plaintiff John Kresich

DATED: November 8, 2016

HINSHAW & CULBERTSON LLP

By: /s/ Royal F. Oakes

Royal F. Oakes
Michael A.S. Newman
James C. Castle
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Life Insurance Company

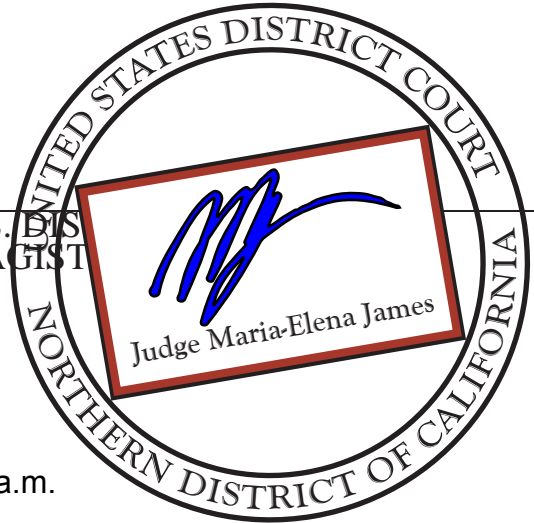
~~[PROPOSED]~~ ORDER

Having reviewed the parties' stipulation and good cause appearing, the Court
the following schedule. See below.
hereby orders ~~that the discovery cut off is extended to December 31, 2016 and the~~
~~motion filing deadline is extended to February 1, 2017.~~

IT IS SO ORDERED.

DATED: November 9, 2016

U.S. DISTRICT
MAGISTR



Jury Trial (5 days): 8/7/2017 @ 9:30 a.m.
Pretrial Conference: 6/29/2017 @ 10:00 a.m.
Final Pretrial Conference: 7/27/2017 @ 10:00 a.m.
Disclosure of Experts Witnesses: 12/20/2016
Disclosure of Rebuttal Expert Witness: 12/30/2016
Discovery Cut-off: 1/17/2017
Deadline to file Dispositive Motions: 2/16/2017
Hearing on Dispositive Motions: 3/23/2017
Exchange of Pretrial Disclosures: 5/24/2017
Deadline to File Pretrial Conference Statements
and related disclosures; Motions in Limine; and Trial
Briefs and related disclosures: 6/8/2017
Deadline to file Motions in Limine Oppositions: 6/15/2017